

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

RAMSEY TOSSA, *et al.*,

Plaintiffs,

v.

ADAM TARDIF, *et al.*,

Defendants.

Civil No. 2:14-cv-12319

Judge Gerald E. Rosen

Mag. Judge Michael J. Hluchaniuk

DEFENDANTS DEA AGENTS AND TFO TARDIF'S WITNESS LIST

Defendants DEA Agents (i.e., Kent Kleinschmidt, Cheryl Benedict, Jeremy Fitch, Justin Holton, Jeffrey Moore, and Steven West) and Task Force Officer Adam Tardif by and through their attorneys, Barbara L. McQuade, United States Attorney for the Eastern District of Michigan, and Theresa Urbanic and Zak Toomey, Assistant United States Attorneys, provide the following preliminary witness list, pursuant to the Court's scheduling order:

1. Ramsey Tossa - A plaintiff, he was present during the execution of a search warrant at 3190 Marc Drive in Sterling Heights on July 26, 2011.
2. Rakia Tossa - A plaintiff, she was present during the execution of a search warrant at 3190 Marc Drive in Sterling Heights on July 26, 2011.
3. Silvia Tossa - A plaintiff, she was present during the execution of a search warrant at 3190 Marc Drive in Sterling Heights on July 26, 2011.

4. Rhonda Tossa - A plaintiff, she was present during the execution of a search warrant at 3190 Marc Drive in Sterling Heights on July 26, 2011.
5. Kent Kleinschmidt – A defendant and supervisory DEA agent, he was present during the execution of a search warrant at 3190 Marc Drive in Sterling Heights on July 26, 2011.
6. Cheryl Benedict - A defendant and DEA agent, she was present during the execution of a search warrant at 3190 Marc Drive in Sterling Heights on July 26, 2011.
7. Jeremy Fitch - A defendant and DEA agent, he was present during the execution of a search warrant at 3190 Marc Drive in Sterling Heights on July 26, 2011.
8. Justin Holton - A defendant and DEA agent, he was present during the execution of a search warrant at 3190 Marc Drive in Sterling Heights on July 26, 2011.
9. Jeffrey Moore - A defendant and DEA agent, he was present during the execution of a search warrant at 3190 Marc Drive in Sterling Heights on July 26, 2011.
10. Steven West - A defendant and DEA agent, he was present during the execution of a search warrant at 3190 Marc Drive in Sterling Heights on July 26, 2011.
11. Adam Tardif - A defendant and DEA task force officer, he was present during the execution of a search warrant at 3190 Marc Drive in Sterling Heights on July 26, 2011.
12. David Powell - A defendant and DEA task force officer, he was present during the execution of a search warrant at 3190 Marc Drive in Sterling Heights on July 26, 2011.
13. Trooper Matthew Unterbrink - A defendant and Michigan State Police trooper, he was present during the execution of a search warrant at 3190 Marc Drive in Sterling Heights on July 26, 2011.

14. Trooper Dawn Zonca - A Michigan State Police trooper, she was present during the execution of a search warrant at 3190 Marc Drive in Sterling Heights on July 26, 2011.
15. Kenneth Bresinski - A defendant and Sterling Heights Police Department officer, he was present during the execution of a search warrant at 3190 Marc Drive in Sterling Heights on July 26, 2011.
16. Thomas Stechly - A defendant and Sterling Heights Police Department officer, he was present during the execution of a search warrant at 3190 Marc Drive in Sterling Heights on July 26, 2011.
17. Kristie Kaufman – May have been a 911 dispatcher for the City of Sterling Heights on July 26, 2011.
18. Nancy Dupre – May have been a 911 dispatcher for the City of Sterling Heights on July 26, 2011.
19. Carly Hall – May have been a 911 dispatcher for the City of Sterling Heights on July 26, 2011.
20. Helen Tsouroullis – May have been a 911 dispatcher for the City of Sterling Heights on July 26, 2011.
21. Kelly Brugan – A member of the Sterling Heights Fire Department who may have responded to a request for medical assistance at 3190 Marc Drive in Sterling Heights on July 26, 2011.
22. Gary Choate – A member of the Sterling Heights Fire Department who may have responded to a request for medical assistance at 3190 Marc Drive in Sterling Heights on July 26, 2011.
23. Ryan Glick – A member of the Sterling Heights Fire Department who may have responded to a request for medical assistance at 3190 Marc Drive in Sterling Heights on July 26, 2011.
24. Patrick Raney – A member of the Sterling Heights Fire Department who may have responded to a request for medical assistance at 3190 Marc Drive in Sterling Heights on July 26, 2011.

25. Jason Yousif – Subject of narcotics search warrants executed at 134 Manchester Avenue in Highland Park and 3190 Marc Drive in Sterling Heights.
26. Hani Nuri Yousif – Jason Yousif’s father.
27. Isfahan Nuri – Jason Yousif’s mother.
28. Sabina Yacoub – Daughter/sister of the plaintiffs.
29. Roy Tossa – Son/brother of the plaintiffs.
30. Sakiba Delic – Neighbor of the plaintiffs on Marc Drive.
31. David M. Donaldson, D.O. – Doctor who cared for Ramsey Tossa at the emergency room at William Beaumont Hospital in Royal Oak on July 26, 2011.
32. Jessica Zimmerman, R.N. – Nurse who cared for Ramsey Tossa at the emergency room at William Beaumont Hospital in Royal Oak on July 26, 2011.
33. Annalisa Flattery, R.N. – Nurse who cared for Ramsey Tossa at the emergency room at William Beaumont Hospital in Royal Oak on July 26, 2011.
34. Colleen Noechel, R.N. – Nurse who cared for Ramsey Tossa at the emergency room at William Beaumont Hospital in Royal Oak on July 26, 2011.
35. Dr. Raad Kasmikha – Healthcare provider for Ramsey Tossa.
36. Dr. Zakwan Mahjoub – Healthcare provider for Ramsey Tossa.
37. Dr. Ghinwa Nakkash – Healthcare provider for Rakia Tossa.
38. Dr. Talia Karmo Al-Hamando – Healthcare provider for Rakia Tossa.

39. Alexis Wiley – Reporter who interviewed Ramsey Tossa regarding this event.
40. Teresa Brady of Evidence Express – Organized the inspection of 3190 Marc Drive in Sterling Heights and facilitated the provision of photographs and floorplans.
41. Kevay Nelson of Evidence Express – Inspected 3190 Marc Drive in Sterling Heights to provide photographs and floorplan.
42. Katie Schoen of Evidence Express – Inspected 3190 Marc Drive in Sterling Heights to provide photographs and floorplan.
43. Donna Rinnas, Ph.D. – Expert witness to examine plaintiff(s) and provide opinion regarding alleged injuries.
44. Elissa Benedek, M.D. – Expert witness to examine plaintiff(s) and provide opinion regarding alleged injuries.
45. Daniel R. Ouellette, M.D. – Expert witness, a pulmonologist, to provide opinion regarding alleged injuries.
46. Stephen Taibi – Expert witness who will testify regarding DEA policy and procedure.
47. Any and all necessary rebuttal witnesses.
48. All persons necessary to authenticate any document or lay foundation for any documents, exhibits, or demonstrative evidence.
49. All witnesses listed or identified on any other party's witness list.

50. Defendants DEA Agents and TFO Tardif reserve the right to add additional witnesses as become known through discovery or otherwise, up to and during the time of trial.

Respectfully submitted,

BARBARA L. McQUADE
United States Attorney

/s/Theresa Urbanic
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July 11, 2016

CERTIFICATE OF SERVICE

I hereby certify that, on **July 11, 2016**, I electronically filed the foregoing paper with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all ECF participants in this case.

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